

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF NORTH CAROLINA  
WINSTON-SALEM-DIVISION

LARRY D. REID and LARRY REID LIVE, LLC,	
	Plaintiffs,
v.	Civil Action
LAVONTRAYE ANDREWS, Defendant.	No. 1:22-cv-00880-WO-JEP

**AFFIDAVIT OF LAVONTRAYE ANDREWS IN SUPPORT OF MOTION TO DISMISS**

I, LaVontraye Andrews, swear under penalty of perjury that the following statements are true and correct and based on my personal knowledge, except statements upon information and belief:

1. I am the defendant in the above-entitled action.
2. I am 32 years of age.
3. I am a natural born citizen of the United States.
4. I am a domiciliary of Georgia since 2015 to present.
5. I am and was a domiciliary of Georgia on 10/13/2022.
6. I began my physical presence in Georgia in 2015.
7. Since 2015 to present, I intend to remain in Georgia.
8. Since 2015, I intend to remain Georgia indefinitely.
9. I have not been served process in this pending action.
10. Upon information and belief, process in this action may have been delivered to Sharon Benissan on 10/20/2022 at *her home* located at 1700 Rose Hill Court, Kernersville, NC 27284, as per ECF Doc. No. 5.

11. 1700 Rose Hill Court, Kernersville, NC 27284 is not my dwelling or usual place of abode.
12. Sharon Benissan is not my authorized or appointed agent for service of process.
13. I have not waived service of process in this case.
14. I have not authorized or consented to service of process of any person other than upon myself.
15. Attached hereto is a true and correct copy of my Georgia's driver's license, which is current and active.
16. I have redacted personal information on my Georgia's driver's license for my privacy and safety.
17. I have never made any false statements as it pertains to Larry D. Reid, who is the plaintiff herein.
18. Any statements made by me concerning Larry D. Reid, plaintiff, have been true and correct.
19. I have not made any false statements with malice concerning Larry D. Reid, plaintiff.
20. I have not committed any unlawful acts against Larry Reid Live LLC, plaintiff, in commerce or otherwise.
21. I do not own property in North Carolina.
22. I do not consent to jurisdiction of this Court.
23. I do not consent to jurisdiction in North Carolina.

I swear that the foregoing statements are true and correct.

Dated: 11/03/2022

*LaVontraye Cornelius Andrews*  
LaVontraye Andrews

State of Virginia

County of Henrico

Before me, LaRonda Shanik Toler, on this day personally appeared, **LaVontraye Andrews**, to be the person whose name is subscribed on the foregoing affidavit and acknowledged to me that he executed the same for the purposes and consideration therein expressed. Given under my hand and seal of office this 11/03/2022.

*LaRonda Shanik Toler*  
\_\_\_\_\_  
Notary Public's Signature

Print: LaRonda Shanik Toler



My commission expires:

04/30/2024

Notarized online using audio-video communication

